

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003
Tel: +1 212 556 2100
Fax: +1 212 556 2222
www.kslaw.com

Israel Dahan
Partner
Direct Dial: +1 212 556 2114
Direct Fax: +1 212 556 2222
idahan@kslaw.com

September 14, 2020

Via ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Major Energy Electric Services, LLC, et al. v. Saul Horowitz et al.*, Civ. No. 19-cv-10431 (NRB)

Dear Judge Buchwald:

We are counsel to Defendants in the above-referenced matter and write jointly with the Plaintiffs pursuant to Local Rule 5.2(b) and 7.1(d) in response to the Court's letter order dated September 11, 2020 [ECF No. 31]. The parties understand and respect the Court's position on their previous joint request for a complete stay of all deadlines. However, because Defendants had opened a settlement dialogue with Plaintiffs and therefore both sides were attempting to preserve resources, they have not yet held a Rule 26(f) conference, exchanged initial disclosures, or otherwise agreed to a discovery plan. Thus, the parties write to respectfully request that the initial case conference scheduled for September 29, 2020 at 12:30 p.m. [ECF No. 29] be moved to a date approximately three to four weeks thereafter, in order to give the parties time to comply with their Rule 26(f) obligations, exchange initial disclosures and provide the Court with a proposed joint discovery plan in advance of an initial case conference. The requested extension also accounts for the upcoming Jewish holidays, which are observed by counsel in this matter. The parties have not previously sought an extension of the initial conference date.

Thank you for your consideration.

The Honorable Naomi Reice Buchwald

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Respectfully submitted,

KING & SPALDING LLP

MORGAN, LEWIS & BOCKIUS LLP

/s/ Israel Dahan

Israel Dahan

Counsel for Defendants

/s/ Troy S. Brown

Troy S. Brown

Counsel for Plaintiffs

cc: All Counsel of Record (*via ECF*)